


EXHIBIT D


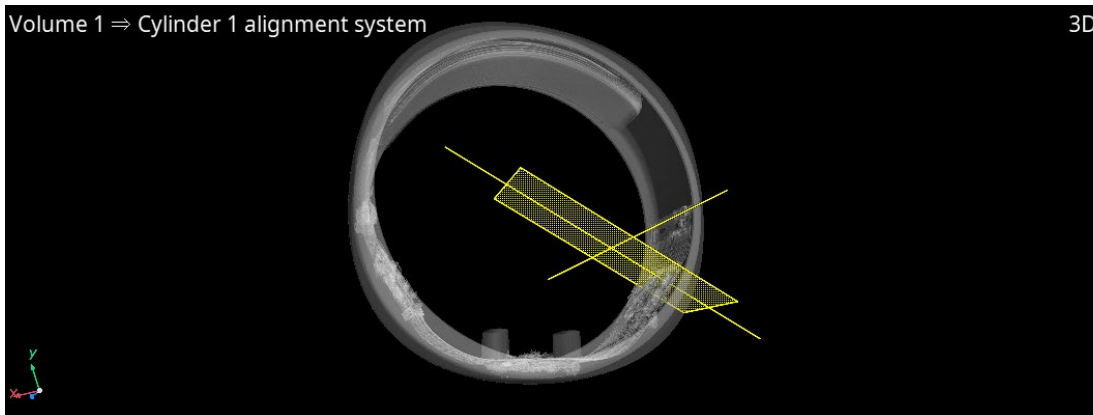
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
[1-P] A wearable computing device configured to be worn around a finger of a wearer comprising:	<p>Plaintiff asserts that the preamble is limiting. The Accused Products are wearable computing devices configured to be worn around a finger of a wearer comprising:</p> 

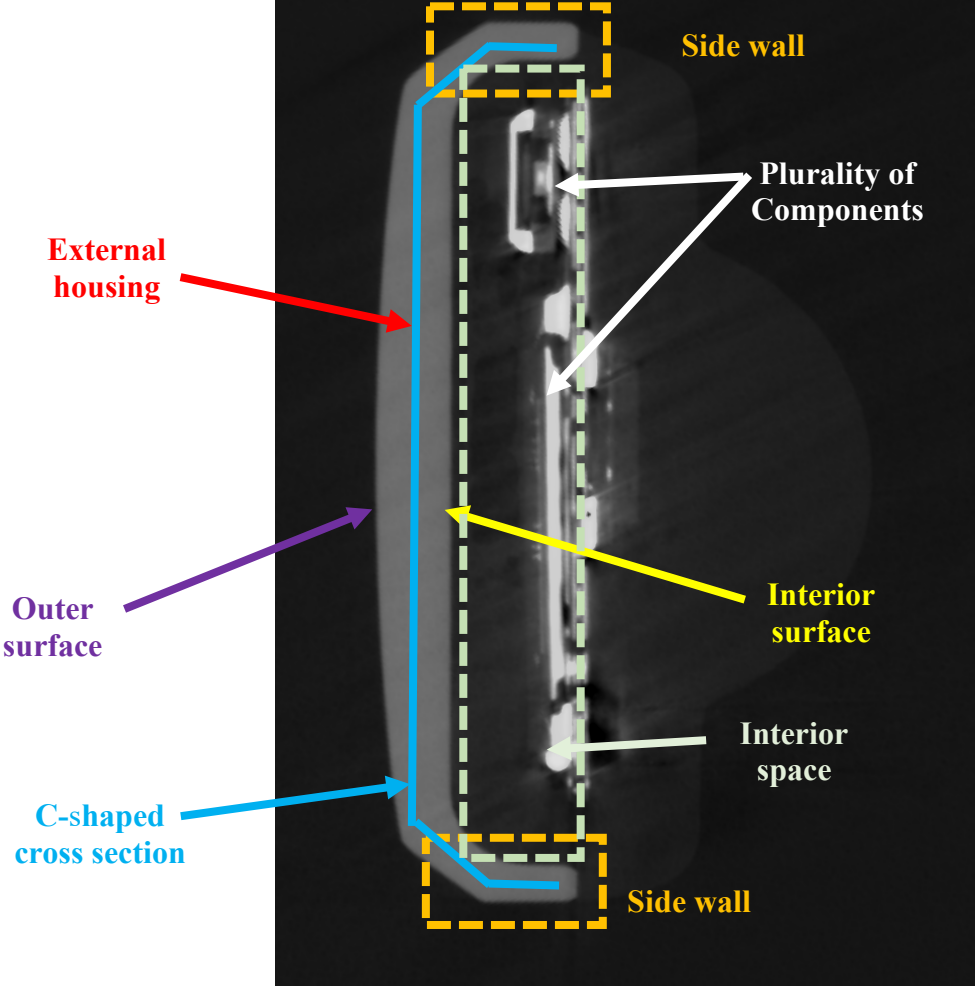
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	

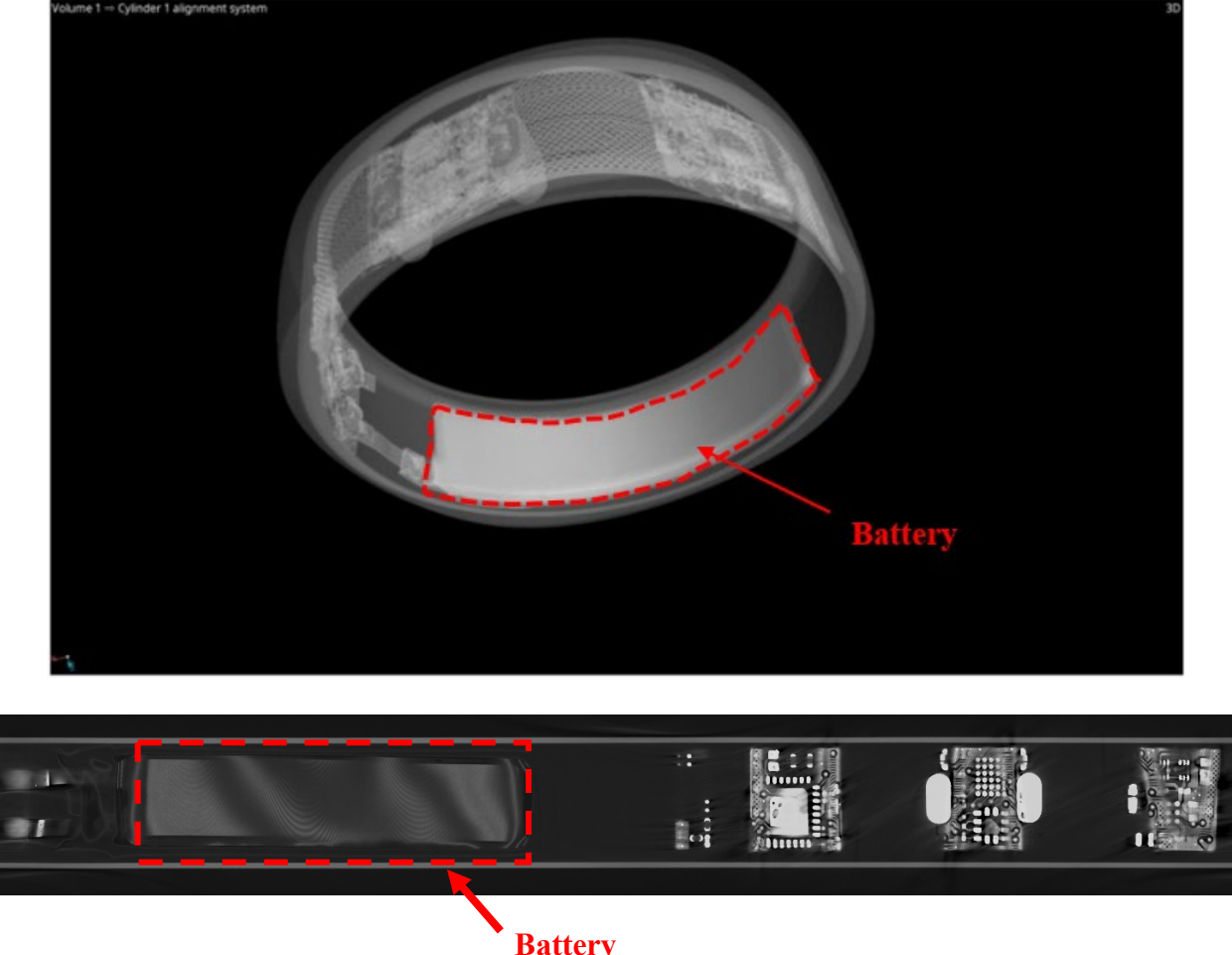
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p> Accurate Health Starts on Your Finger</p> <p>Unlike wrist-worn smartwatches, the RingConn Gen 2 Smart Ring utilizes the finger's thin skin and abundant capillaries for precise tracking. Despite its slim design, the RingConn Gen 2 incorporates advanced PPG sensors, temperature sensors, and 3D accelerometers to ensure exceptional accuracy.</p> <p>https://www.kickstarter.com/projects/2059923007/ringconn-gen-2-ultimate-lightness-12-days-battery?ref=discovery</p>
<p>[1-A] an external housing having an outer surface, an interior surface and sidewalls, wherein the interior surface and the sidewalls are characterized by approximately a C-shaped cross section and define an interior space, and wherein the interior space is configured to retain a plurality of components;</p>	<p>The Accused Products include an external housing having an outer surface, an interior surface and sidewalls, wherein the interior surface and the sidewalls are characterized by approximately a C-shaped cross section and define an interior space, and wherein the interior space is configured to retain a plurality of components as shown below by CT Scan images of the Accused Products:</p> <div data-bbox="686 971 1772 1383"> <p>Volume 1 ⇒ Cylinder 1 alignment system 3D</p>  </div>

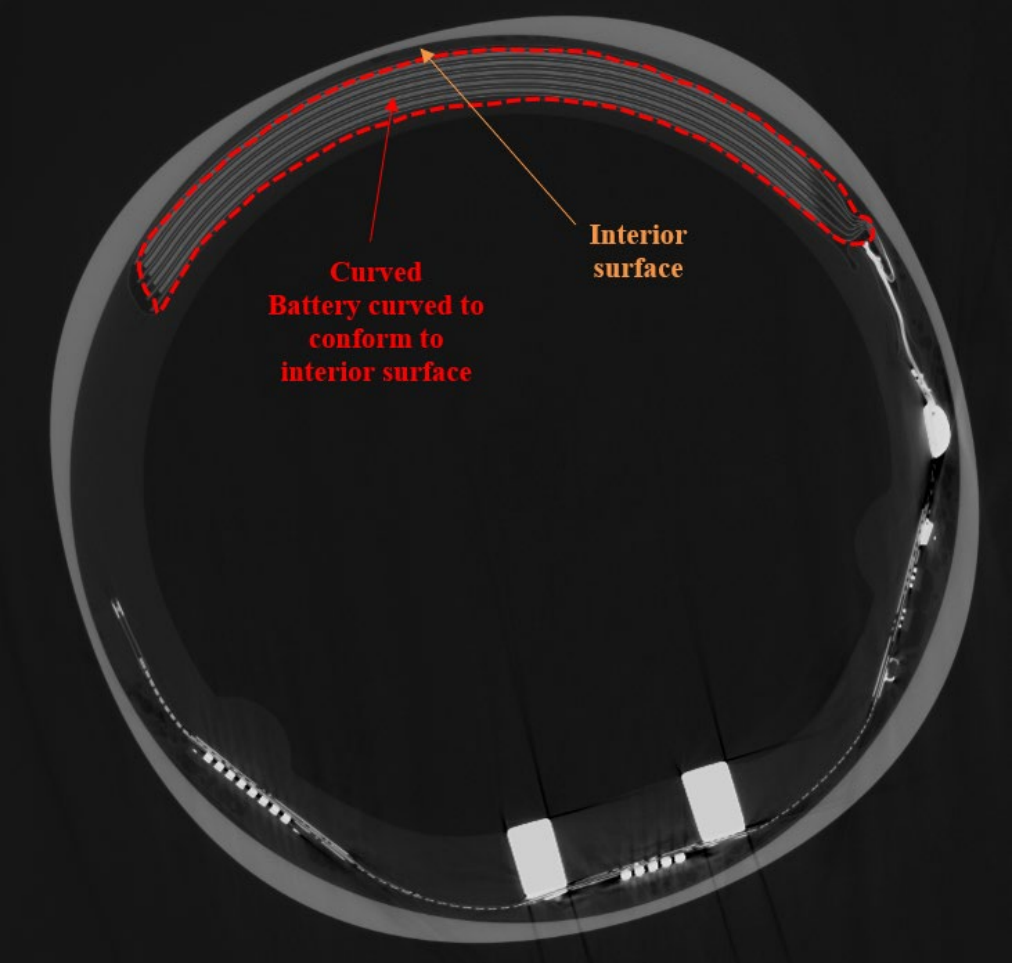
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram illustrates a cross-section of a RingConn Smart Ring. It features a C-shaped cross-section with an outer surface and an inner surface. The interior of the ring is labeled as the interior space. The side walls of the ring are highlighted with dashed yellow boxes. A plurality of components are visible within the interior space, including a sensor or display element. The diagram is annotated with several labels and arrows: 'External housing' (red arrow), 'Outer surface' (purple arrow), 'C-shaped cross section' (blue arrow), 'Side wall' (yellow dashed boxes), 'Plurality of Components' (white arrow), 'Interior surface' (yellow arrow), and 'Interior space' (white arrow).</p>

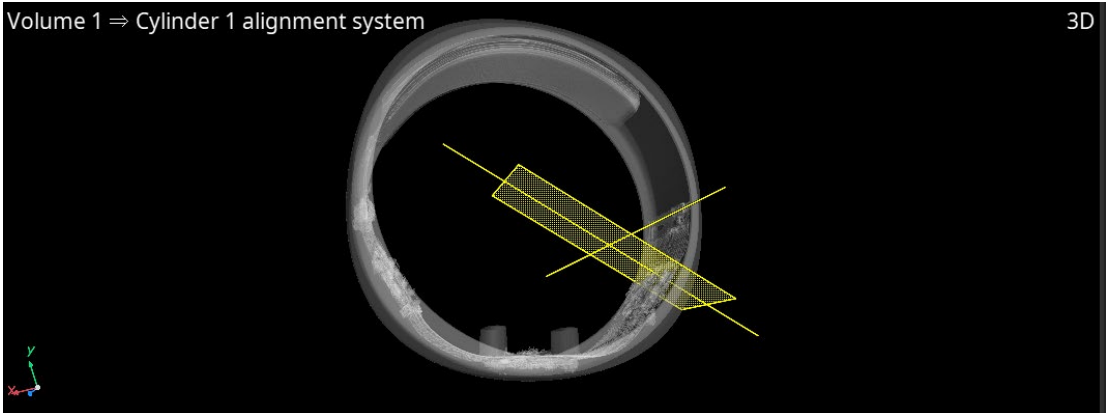
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>[1-B1] wherein the plurality of components comprises:</p> <p>a curved rechargeable battery disposed within the interior space of the housing, wherein the rechargeable battery is curved to conform to the interior surface;</p>	<p>The Accused Products include a plurality of components that comprise a curved rechargeable battery disposed within the interior space of the housing, wherein the rechargeable battery is curved to conform to the interior surface.</p>  <p>The top image is a 3D CAD model of the ring's interior, showing the curved rechargeable battery highlighted with a red dashed line and labeled "Battery". The bottom image is a photograph of the disassembled ring components, showing the curved rechargeable battery highlighted with a red dashed line and labeled "Batterv".</p>

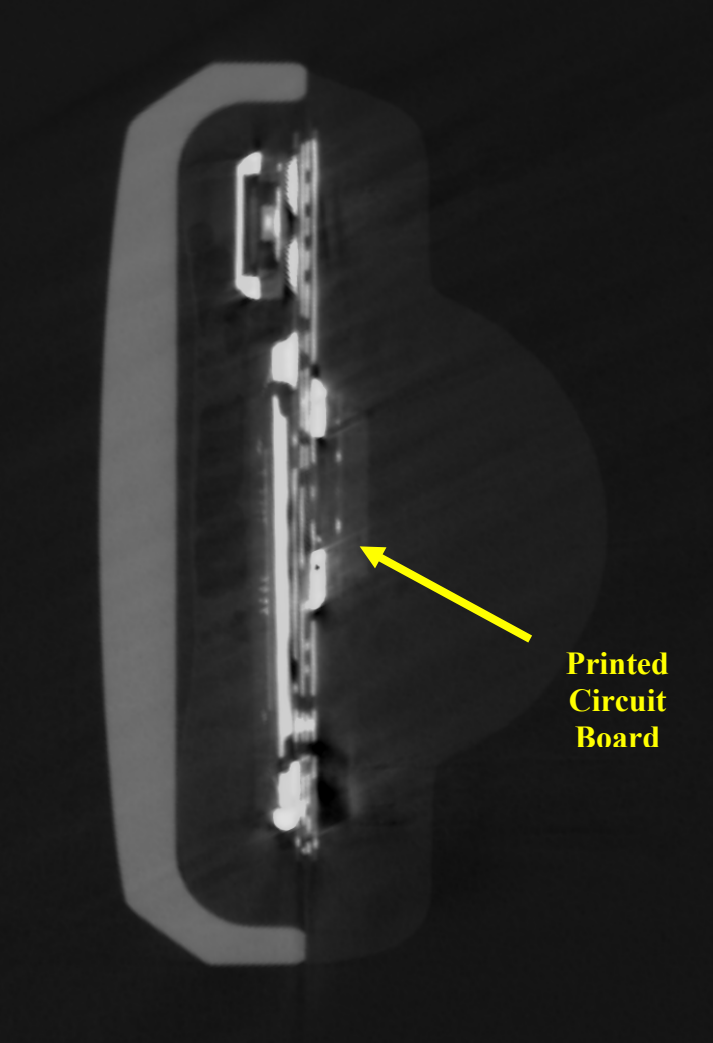
RingConn Infringement Claim Chart – U.S. Pat. No. 11,188,124

Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>The diagram is a cross-sectional view of a ring. It features a curved battery, indicated by a red dashed line, which is positioned to conform to the interior surface of the ring. A red arrow points from the text 'Curved Battery curved to conform to interior surface' to the battery. Another red arrow points from the text 'Interior surface' to the inner curve of the ring. The ring's interior surface is labeled 'Interior surface' in orange text. The battery is shown as a series of parallel lines, suggesting its segmented or layered construction. The ring itself is depicted in a dark gray color with a lighter gray interior surface.</p>

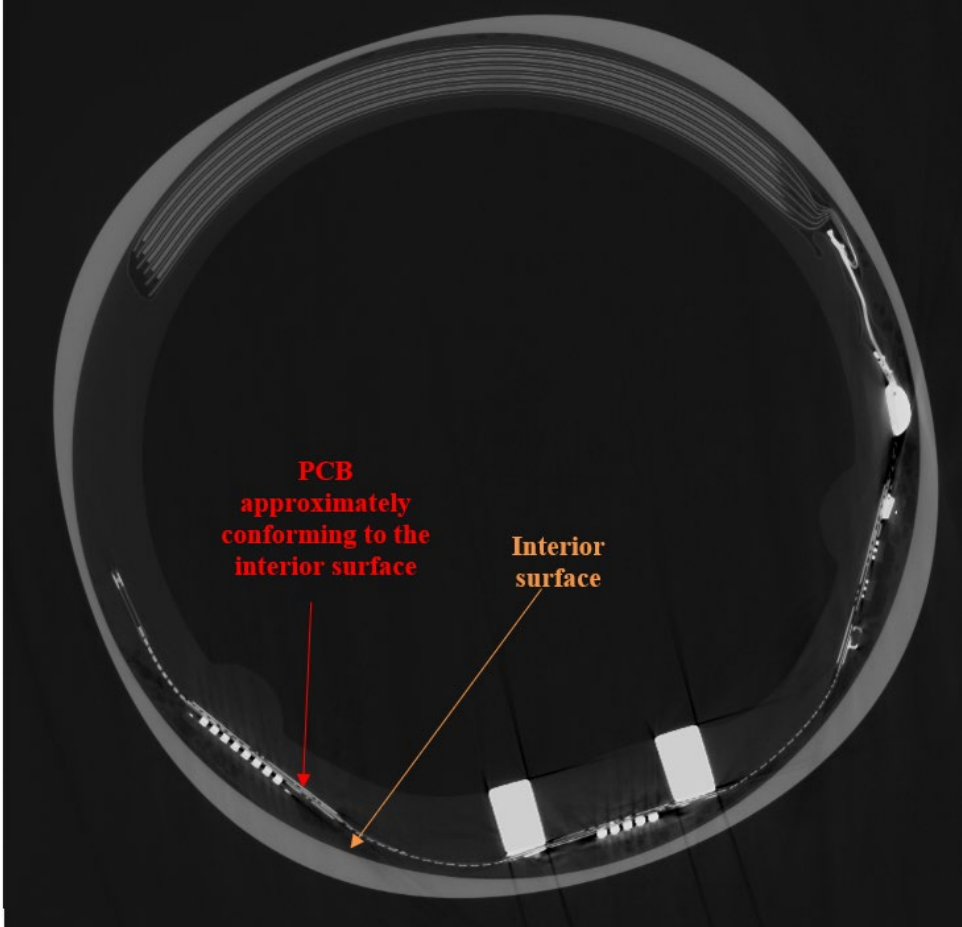
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	<p>Battery & Power</p> <ul style="list-style-type: none"> • Ring Battery Life: Up to 7 days on a single charge. • Portable Charging Case: 500mAh capacity for 18 full recharges. • Full charge in 90 minutes with Ring's fast charging capability. <p>https://ringconn.com/products/smart-ring</p>
<p>[1-B2] a printed circuit board disposed within the interior space configured to approximately conform to the interior surface;</p>	<p>The Accused Products include a printed circuit board disposed within the interior space configured to approximately conform to the interior surface:</p> 


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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)		
			

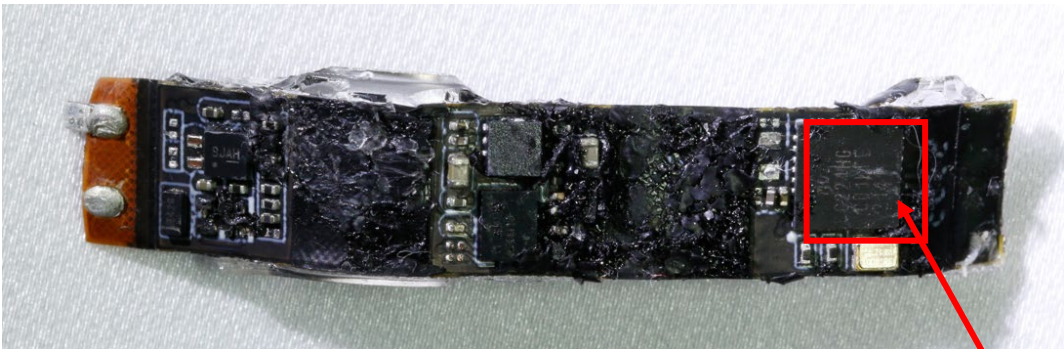
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	
<p>[1-B3] one or more sensors disposed upon the printed circuit board, wherein the one or more sensors are selected from a group</p>	<p>The Accused Products include one or more sensors disposed upon the printed circuit board, wherein the one or more sensors are selected from a group consisting of: an accelerometer, a gyroscope, and a motion sensor, wherein the one or more sensors are configured to sense physical perturbations and to output sensed data:</p>

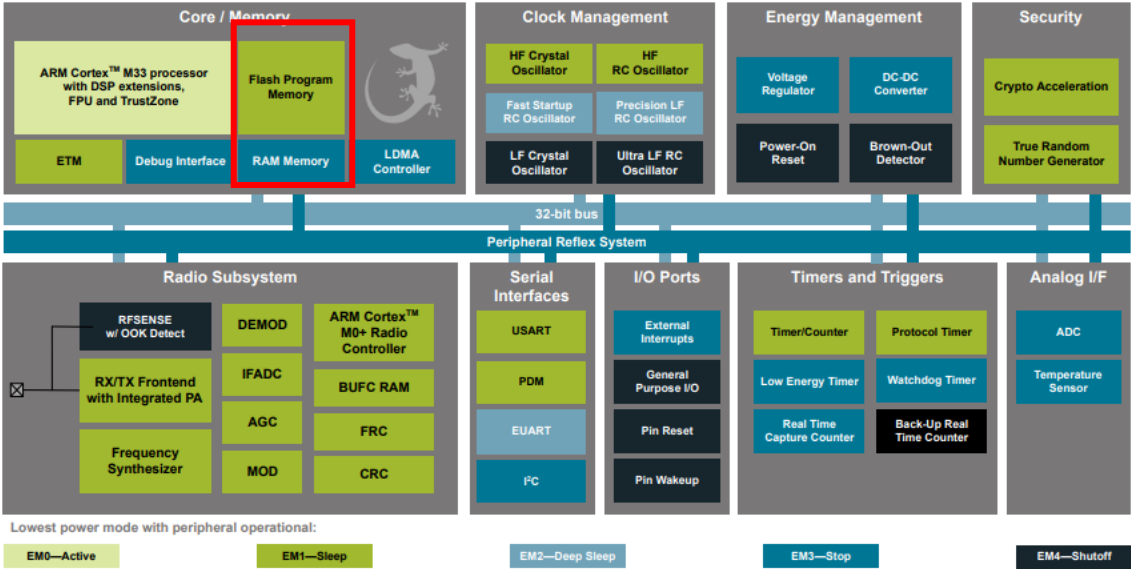
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>consisting of: an accelerometer, a gyroscope, and a motion sensor, wherein the one or more sensors are configured to sense physical perturbations and to output sensed data;</p>	<div data-bbox="753 284 1724 1011">  </div> <p>https://ringconn.com/products/smart-ring</p> <p>Sensor</p> <ul style="list-style-type: none"> • Photoplethysmography (PPG) Sensor × 4 • Temperature Sensor × 4 • 3D Accelerometer <p><i>Id.</i></p>
<p>[1-B4] a memory disposed upon the printed circuit board, the memory</p>	<p>On information and belief, the Accused Products include a memory disposed upon the printed circuit board, the memory configured to store one or more executable instructions. For example, RingConn advertises that the Accused Products include the “ability to temporarily store data” that would be stored in memory:</p>

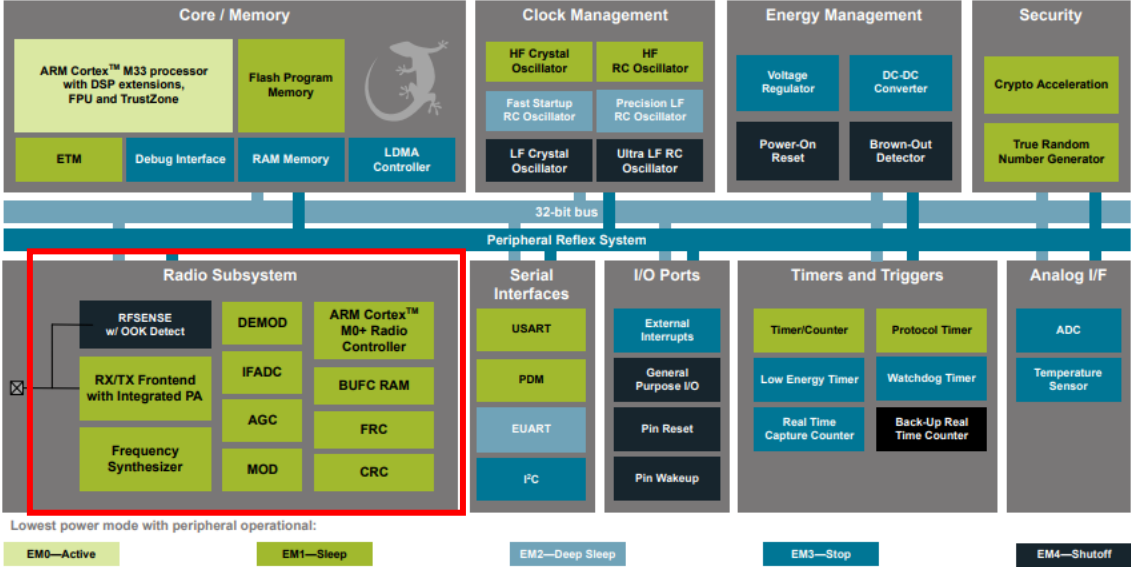
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
configured to store one or more executable instructions;	<p data-bbox="655 331 1352 358">Does RingConn Smart Ring have offline storage function?</p> <p data-bbox="655 391 1839 570">The RingConn smart ring utilizes Bluetooth connectivity for transmitting and synchronizing data. It also has the ability to temporarily store data for subsequent synchronization in case Bluetooth is deactivated. Nonetheless, please note that the ring can retain monitoring data offline for up to 7 days only. To ensure seamless data synchronization, we advise you to establish a Bluetooth connection between the ring and your phone within this 7-day window and synchronize the data to the app.</p> <p data-bbox="533 610 1062 643">https://ringconn.com/products/smart-ring</p> <p data-bbox="533 683 1892 789">In addition, the Accused Products include a printed circuit board, shown below based on tear down of the RingConn Smart Ring, that has a Silicon Lab’s wireless SoCs and includes a 76.8 MHz ARM Cortex-M33 core that includes core memory, including flash program memory and RAM memory:</p> <div data-bbox="709 824 1766 1170">  </div> <p data-bbox="1558 1198 1940 1255">Silicon Labs EFR32BG22 Wireless Gecko SoC</p>


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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Lowest power mode with peripheral operational:</p> <p>EM0—Active EM1—Sleep EM2—Deep Sleep EM3—Stop EM4—Shutoff</p> <p>https://www.silabs.com/documents/public/data-sheets/efr32bg22-datasheet.pdf (Page 1)</p>
<p>[1-B5] a short-range communication module disposed upon the printed circuit board, the short-range communications module configured to communicate a first set of data to a client computing device via a first communications protocol;</p>	<p>On information and belief, the Accused Products include a short-range communication module disposed upon the printed circuit board, the short-range communications module configured to communicate a first set of data to a client computing device via a first communications protocol.</p> <p>Connectivity</p> <ul style="list-style-type: none"> • Bluetooth 5.2 (Low power bluetooth module) • EMF-Safe and Allows Airplane Mode <p>https://ringconn.com/products/smart-ring</p> <p>As discussed above, the Accused Products include a Silicon Lab’s wireless SoC that is a single-die solution that combines 76.8 MHz ARM Cortex-M33 with 2.4 GHz radio for short-range communication:</p>

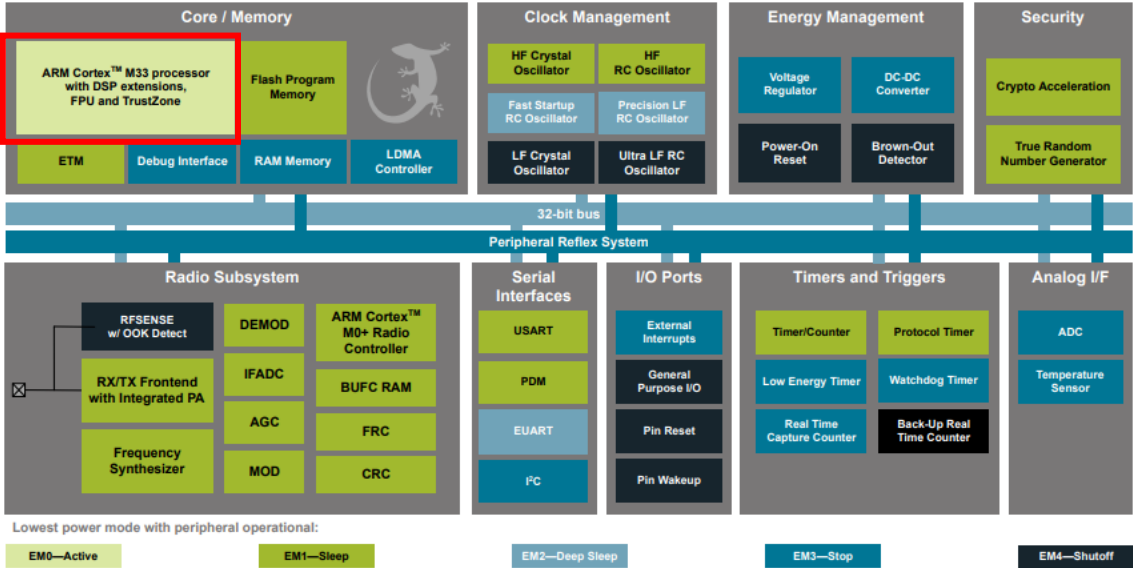
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
	 <p>Lowest power mode with peripheral operational:</p> <p>EM0—Active EM1—Sleep EM2—Deep Sleep EM3—Stop EM4—Shutoff</p> <p>https://www.silabs.com/documents/public/data-sheets/efr32bg22-datasheet.pdf (Page 1)</p> <ul style="list-style-type: none"> • Radio Performance <ul style="list-style-type: none"> • -106.7 dBm sensitivity @ 125 kbps GFSK • -98.9 dBm sensitivity @ 1 Mbit/s GFSK • -96.2 dBm sensitivity @ 2 Mbit/s GFSK • TX power up to 6 dBm • 2.5 mA radio receive current • 3.4 mA radio transmit current @ 0 dBm output power • 7.5 mA radio transmit current @ 6 dBm output power <p><i>Id.</i></p>

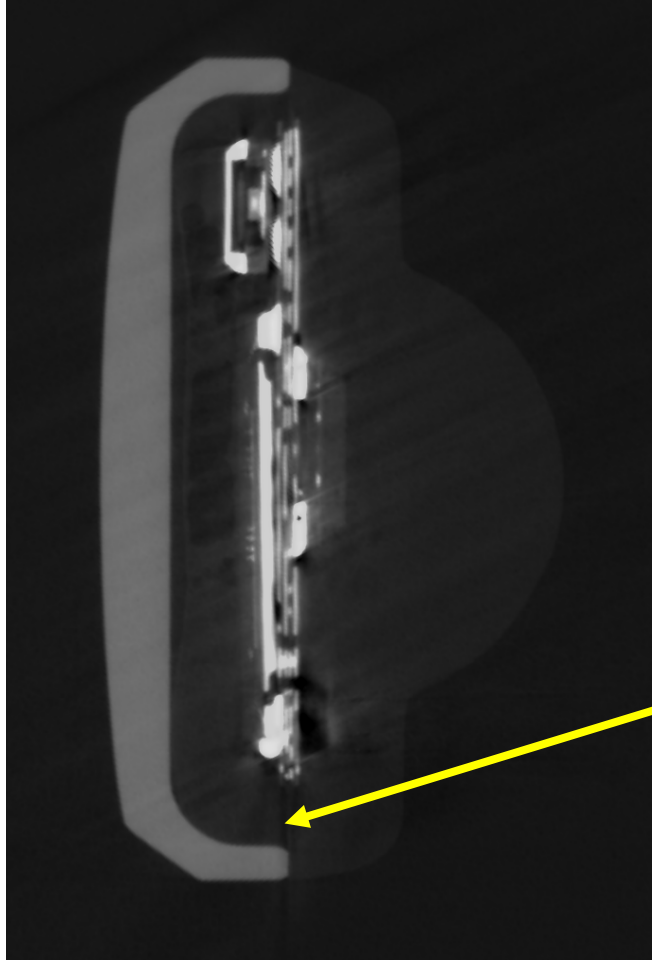
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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>[1-B6] a first temperature sensor configured to provide first temperature data associated with a temperature of a wearer of the wearable computing device,</p>	<p>The Accused Products include a first temperature sensor configured to provide first temperature data associated with a temperature of a wearer of the wearable computing device. For example, RingConn advertises that the Accused Products include temperature sensor to monitor a user’s body temperature:</p>  <p>Temperature Sensor Monitor your body temperature, offer insights into health and wellness indicators.</p> <p>https://ringconn.com/products/smart-ring</p>
<p>[1-B7] a processor disposed upon the printed circuit board and coupled</p>	<p>The Accused Products include a processor disposed upon the printed circuit board and coupled to the battery, the one or more sensors, the memory, the short-range communication module, and the first temperature sensor, wherein the processor is configured to receive the sensed data, is configured to perform the one or</p>

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Independent Claim 1 of the '124 patent	RingConn Smart Ring, Gen. 1 and Gen. 2 (“Accused Products”)
<p>to the battery, the one or more sensors, the memory, the short-range communication module, and the first temperature sensor, wherein the processor is configured to receive the sensed data, is configured to perform the one or more executable instructions in response to the sensed data, and is configured to direct the short-range communication module to output data to the client computing device; and</p>	<p>more executable instructions in response to the sensed data, and is configured to direct the short-range communication module to output data to the client computing device:</p> <p>For example, the Accused Products include a Silicon Lab’s ARM Cortex-M33 processor:</p>  <p>https://www.silabs.com/documents/public/data-sheets/efr32bg22-datasheet.pdf (Page 1)</p> <p>On information and belief, the processor is configured receive the sensed data, is configured to perform the one or more executable instructions in response to the sensed data, and is configured to direct the short-range communication module to output data to the client computing device.</p>
<p>[1-C] a potting material disposed in the interior space encapsulating the plurality of components,</p>	<p>The Accused Products include a potting material disposed in the interior space encapsulating the plurality of components, wherein the potting material forms an interior wall of the wearable computing device, wherein the potting material is substantially transparent to light selected from a group consisting of: visible light, infrared light, and ultraviolet light:</p>

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<p>wherein the potting material forms an interior wall of the wearable computing device, wherein the potting material is substantially transparent to light selected from a group consisting of: visible light, infrared light, and ultraviolet light.</p>	<div data-bbox="909 318 1556 1273">  </div> <p data-bbox="1583 927 1911 1068">Potting Material disposed in the interior space encapsulating the plurality of component</p>